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Via ECF

Honorable Andrew L. Carter Jr.
Southern District of New York
500 Pearl Street Room 2230
New York, NY 10007

April 15, 2019

RE: JSMN Shenango Valley Mall LLC v. Paradigm Credit Corporation
Civ Action No. 17-9994

Dear Hon. Judge Carter Jr.:

I represent Plaintiff JSMN Shenango Valley Mall LLC, in the above referenced matter. As Your Honor would know that parties to this action had reached a settlement in principle in the related action, *Iowa Square Realty LLC v Ravinder Thota et al.*, 17-cv-09933 (RJS), pending in the Southern District of New York. Based on settlement in principle, parties to this action had approached this Court and had requested discontinuance of the present action. Accordingly, the Court passed an Order on August 1, 2018 (ECF Document No. 82) whereby, Honorable Court discontinued the action without prejudice to restore the action to the Court's calendar if such an application is made no later than October 30, 2018.

On January 16, 2019 a letter request for Extension of Time pending final settlement between the parties in the related action was made to the court (See ECF document #85). The same was endorsed and "So Ordered" by your honor on January 23, 2019. Now, we write to inform the Court that the related action is yet not fully settled as; plaintiff has filed a Motion which is still pending and needs more time to settle the terms of the principle agreement.

I have conferred (Via Email) with all Attorneys representing Defendants Paradigm Credit Corporation and Iowa Square Realty LLC, Namdar Realty Group, and Igal Namdar. No objection is received from any party, as of time of filing of this request to restore this matter to the Court's calendar, pending final settlement between the parties in the related action. Accordingly, I request another extension of to extend of sixty (60) days pending final settlement.

We very much appreciate Your Honor's consideration and are available for a conference if the Court would like to address this matter with counsel in more detail.

Respectfully,

/s/ Sanjay Chaubey, Esq.
Attorney for Plaintiff

JSMN Shenango Valley Mall LLC

cc: Raymond A. Quaglia, Esq.
Justin W. Lamson, Esq.
Ira S. Clair, Esq.